



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY  
NEW YORK, NY 10007-1866

AUG 26 2005

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Article Numbers: 7003 2260 0000 3241 8736 - 7003 2260 0000 3241 8743

Mr. Thomas H. Defibaugh  
BDH Oil Co., Inc.  
580 Interstate Parkway  
Bradford, PA 16701

Mr. Joseph J. Bucher  
BDH Oil Company, Inc.  
108 Pleasant Street  
Bolivar, NY 14715

Re: Plugging Priorities, Nichols Run Lease, NYU118281

Dear Messieurs Defibaugh and Bucher:

The Environmental Protection Agency (EPA) is pleased that BDH Oil Company (BDH) had begun the process of bringing the injection wells at the above-referenced lease into compliance with EPA regulations. Based upon the results of EPA's inspections of August 2003 and May 2005, EPA has developed a plugging priority list for BDH's injection wells. EPA considered the depth of the annular fluid, oil column found in the annular fluid, proximity of the wells to homes and streams such that contaminants could impact drinking water supplies and/or surface waters and accessibility of the wells. Enclosure 1 is the priority list EPA developed based upon these factors. Note in particular the Priority 1 injection wells-these wells should be properly plugged and abandoned as soon as possible.

Should you have any questions and/or believe that one or more of the priorities should be modified, please contact Frank Brock of my staff by telephone at (212) 637-3762 or by e-mail at [brock.frank@epa.gov](mailto:brock.frank@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis J. McChesney".

Dennis J. McChesney, Chief  
Ground Water Compliance Section

Enclosure

bcc: F. Brock  
J. Blair

**NDER: COMPLETE THIS SECTION**

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Mr. Joseph J. Bucher  
3DH Oil Company, Inc.  
08 Pleasant Street  
Solivar, NY 14715

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*Mary Bucher*  Agent  
 Addressee

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## ENCLOSURE 1

BDH OIL COMPANY  
INJECTION WELL PLUGGING PRIORITY

| WELL                  | FLUID DEPTH                     | YEAR FLUID MEASURED | TOP OF OIL IN WELL                              | PLUGGING PRIORITY*                   |
|-----------------------|---------------------------------|---------------------|---|--------------------------------------|
| EW-14 NEAR STREAM     | 76'<br>86'                      | 2003<br>2005        | 47'   | 1                                    |
| EW-20                 | 1/2 WAY UP BOX<br>16'           | 2003<br>2005        | SKIM  | 1                                    |
| GW-19                 | 103'<br>105'                    | 2003<br>2005        | 55'-OIL IN BOX<br>50'                           | 1                                    |
| HW-14                 | 61'<br>>57' OBSTRUCTION         | 2003<br>2005        | 53'-OIL SPILL ON LOCATION                       | 1                                    |
| HW-16                 | 37'<br>>220' OBSTRUCTION        | 2003<br>2005        | 26'-OIL SLUDGE IN BOX                           | 1                                    |
| HW-22-NEXT TO STREAM  | UP IN WELL BOX<br>TOP OF CASING | 2003<br>2005        | SKIM  | 1                                    |
| HW-23                 | 22'                             | 2005                | -   | 1                                    |
| HW-24-NEXT TO STREAM  | 111'<br>>187'                   | 2003<br>2005        | 1'<br>37'                                       | 1                                    |
| HW-25 BESIDE STREAM   | 76'<br>115'                     | 2003<br>2005        | 33'<br>75'                                      | 1                                    |
| HW-26                 | 51'<br>67'                      | 2003<br>2005        | 49'<br>40'                                      | 1                                    |
| HW-27                 | BOX 1/2 FULL<br>140'            | 2003<br>2005        | OIL IN BOX<br>135' & OIL IN BOX AND ON LOCATION | 1                                    |
| HW-32 WELL NEAR HOUSE | 40'                             | 2005                | -   | 1                                    |
| HW-214                | WELL UNDER WATER                | 2003                | -   | 1                                    |
| HW-216                | 13'<br>25'                      | 2003<br>2005        | -   | 1                                    |
| HW-219                | GROUND LEVEL<br>1'              | 2003<br>2005        | OIL SHEEN                                       | 1                                    |
| GW-22                 | 400'+                           | 2003                | -   | 1 (same row as others being plugged) |
| HW-205                | TOP BOX<br>1/2 FULL BOX         | 2003<br>2005        | SLIGHT SHEEN                                    | 2                                    |
| BW-8                  | 62'                             | 2005                | -   | 2                                    |
| DW-16                 | 69'                             | 2003<br>2005        | -   | 2                                    |
| EW-23                 | 8'<br>>88' OBSTRUCTION          | 2003<br>2005        | -   | 2                                    |
| EW-30                 | 52'<br>56'                      | 2003<br>2005        | -   | 2                                    |
| EW-32                 | >166'-OIL 98-166'? OBSTRUCTION  | 2005                | 98'   | 2                                    |
| GW-20                 | 33'                             | 2005                | SKIM  | 2                                    |
| GW-23                 | 80'<br>81'                      | 2003<br>2005        | -   | 2                                    |

| WELL   | FLUID DEPTH                     | YEAR FLUID<br>MEASURED | TOP OF OIL IN WELL | PLUGGING<br>PRIORITY* |
|--------|---------------------------------|------------------------|--------------------|-----------------------|
| HW-7   | 20'<br>62'                      | 2003<br>2005           | -<br>SKIM          | 2                     |
| HW-10  | 85'<br>35'                      | 2003<br>2005           | 81'<br>SKIM        | 2                     |
| HW-11  | 45'<br>58'                      | 2003<br>2005           | 42'<br>-           | 2                     |
| HW-18  | 95'                             | 2005                   | -                  | 2                     |
| HW-20  | 86'                             | 2005                   | -                  | 2                     |
| HW-34  | 25'<br>34'                      | 2003<br>2005           | -<br>-             | 2                     |
| HW-201 | 5'<br>3'                        | 2003<br>2005           | -<br>-             | 2                     |
| HW-202 | 0'<br>4'                        | 2003<br>2005           | -<br>-             | 2                     |
| HW-213 | 1'<br>38'                       | 2003<br>2005           | SKIM<br>-          | 2                     |
| HW-217 | 22'<br>36'                      | 2003<br>2005           | -<br>-             | 2                     |
| HW-220 | 90'<br>OBSTRUCTED AT<br>SURFACE | 2003<br>2005           | SKIM<br>-          | 2                     |
| HW-227 | 32'                             | 2005                   | -                  | 2                     |
| HW-228 | 62'                             | 2005                   | -                  | 2                     |
| HW-233 | 8'<br>9'                        | 2003<br>2005           | -<br>-             | 2                     |
| HW-234 | 14'                             | 2005                   | -                  | 2                     |
| 122    | 109'<br>96'                     | 2003<br>2005           | -<br>-             | 2                     |
| DW-8   | 276'<br>338'                    | 2003<br>2005           | 160'<br>-          | 3                     |
| HW-8   | 188'<br>400'+                   | 2003<br>2005           | 183'<br>-          | 3                     |
| HW-9   | 351'<br>380'                    | 2003<br>2005           | 254'<br>260'       | 3                     |
| HW-15  | 259'                            | 2003                   | 238'               | 3                     |
| HW-17  | 113'<br>118'                    | 2003<br>2005           | 111'<br>115'       | 3                     |
| HW-29  | 400'+??                         | 2005                   | 190'               | 3                     |
| HW-208 | 116'                            | 2003                   | 115'               | 3                     |
| HW-209 | 2'<br>360'                      | 2003<br>2005           | -<br>320'          | 3                     |
| HW-218 | 203'<br>> 42' OBSTRUCTION       | 2003<br>2005           | 192'<br>-          | 3                     |
| DW-19  | 271'                            | 2005                   | -                  | 4                     |
| AW-1   | 213'                            | 2003                   | SKIM               | 4                     |
| AW-2   | 193'                            | 2003                   | -                  | 4                     |
| AW-3   | 400'+                           | 2003                   | -                  | 4                     |
| AW-7   | 135'                            | 2003                   | -                  | 4                     |
| BW-4   | 400'+                           | 2005                   | -                  | 4                     |
| BW-5   | >245' OBSTRUCTION               | 2005                   | -                  | 4                     |
| BW-6   | 400'+                           | 2005                   | -                  | 4                     |

| WELL  | FLUID DEPTH       | YEAR FLUID<br>MEASURED | TOP OF OIL IN WELL | PLUGGING<br>PRIORITY* |
|-------|-------------------|------------------------|--------------------|-----------------------|
| BW-7  | >265' OBSTRUCTION | 2005                   | -                  | 4                     |
| BW-9  | 300'+ TIGHT HOLE  | 2005                   | -                  | 4                     |
| CW-1  | 327'              | 2003                   | -                  | 4                     |
| CW-2  | 360'              | 2003                   | -                  | 4                     |
| CW-3  | 188'              | 2003                   | SKIM               | 4                     |
| CW-4  | 256'              | 2005                   | -                  | 4                     |
| CW-6  | 256'              | 2003                   | -                  | 4                     |
| CW-7  | 331'              | 2005                   | -                  | 4                     |
| CW-8  | 252'              | 2003                   | -                  | 4                     |
| DW-4  | 101'              | 2003                   | -                  | 4                     |
|       | 102'              | 2005                   | -                  |                       |
| EW-1  | >220' OBSTRUCTION | 2005                   | -                  | 4                     |
| EW-2  | >205' OBSTRUCTION | 2005                   | -                  | 4                     |
| EW-3  | 236'              | 2005                   | -                  | 4                     |
| EW-8  | 400'+             | 2005                   | -                  | 4                     |
| EW-9  | >227' OBSTRUCTION | 2005                   |                    | 4                     |
| EW-10 | 231'              | 2005                   | -                  | 4                     |
| EW-11 | 400'+             | 2005                   | -                  | 4                     |
| EW-12 | 172'              | 2005                   | -                  | 4                     |
| EW-13 | 400'+             | 2005                   | -                  | 4                     |
| EW-15 | 400"+             | 2003                   | -                  | 4                     |
| EW-16 | 151'              | 2003                   | -                  | 4                     |
| EW-17 | 145'              | 2003                   | -                  | 4                     |
| EW-18 | 123'              | 2005                   | -                  | 4                     |
| EW-19 | 389'              | 2005                   | -                  | 4                     |
| EW-22 | 388'              | 2003                   | SKIM               | 4                     |
| EW-24 | 400'+             | 2005                   | -                  | 4                     |
| EW-25 | 133'              | 2003                   | -                  | 4                     |
| EW-26 | 98'               | 2003                   | -                  | 4                     |
|       | 402'              | 2005                   | -                  |                       |
| EW-27 | 212'              | 2003                   | -                  | 4                     |
| EW-28 | 234'              | 2005                   | -                  | 4                     |
| EW-29 | 108'              | 2005                   | -                  | 4                     |
| EW-31 | 400'+             | 2005                   | -                  | 4                     |
| EW-33 | 400'+             | 2003                   | -                  | 4                     |
| FW-1  | 207'              | 2005                   | -                  | 4                     |
| FW-2  | >355' OBSTRUCTION | 2005                   | -                  | 4                     |
| FW-3  | 400'+             | 2005                   | -                  | 4                     |
| FW-4  | 400'+             | 2005                   | -                  | 4                     |
| FW-5  | 176'              | 2005                   | -                  | 4                     |
| FW-6  | 343'? OBSTRUCTION | 2005                   | -                  | 4                     |
| FW-8  | 400'+             | 2005                   | -                  | 4                     |
| GW-1  | 400'+             | 2003                   | -                  | 4                     |
| GW-2  | 400'+             | 2003                   | -                  | 4                     |
| GW-3  | 282'              | 2003                   | -                  | 4                     |
| GW-4  | 400'+             | 2003                   | -                  | 4                     |
| GW-5  | 400'+             | 2003                   | -                  | 4                     |
| GW-6  | 400'+             | 2003                   | -                  | 4                     |
| GW-7  | 400'+             | 2005                   | -                  | 4                     |
| GW-8  | 310'              | 2003                   | -                  | 4                     |

| WELL                            | FLUID DEPTH                  | YEAR FLUID<br>MEASURED | TOP OF OIL IN WELL | PLUGGING<br>PRIORITY* |
|---------------------------------|------------------------------|------------------------|--------------------|-----------------------|
| GW-9                            | 400'+                        | 2005                   | -                  | 4                     |
| GW-10                           | 219'                         | 2003                   | 218'               | 4                     |
| GW-11                           | 204'?-OBSTRUCTION AT<br>210' | 2003                   | -                  | 4                     |
| GW-12                           | 400'+                        | 2003                   | -                  | 4                     |
| GW-13                           | 180'                         | 2003                   | 178'               | 4                     |
| GW-14-well<br>buried, not found |                              |                        |                    | 4                     |
| GW-15                           | 333'                         | 2005                   | -                  | 4                     |
| GW-16                           | 400'+                        | 2005                   | -                  | 4                     |
| GW-17                           | 400'+                        | 2003                   | -                  | 4                     |
| GW-18                           | 282'                         | 2005                   | -                  | 4                     |
| GW-21                           | >145' OBSTRUCTION            | 2005                   | -                  | 4                     |
| GW-24                           | 153'                         | 2005                   | -                  | 4                     |
| HO-33                           | 274'                         | 2003                   | 260'               | 4                     |
| HO-34                           | 410'                         | 2005                   | -                  | 4                     |
| HW-2                            | 129'                         | 2003                   | -                  | 4                     |
| HW-3                            | 269'                         | 2003                   | -                  | 4                     |
| HW-4                            | 125'                         | 2005                   | 120'               | 4                     |
| HW-5                            | 227'                         | 2005                   | SKIM               | 4                     |
| HW-6                            | 358'                         | 2005                   | -                  | 4                     |
| HW-12                           | 378'                         | 2003                   | -                  | 4                     |
| HW-13                           | 178'                         | 2003                   | SKIM               | 4                     |
| HW-19                           | > 145' OBSTRUCTION           | 2005                   | -                  | 4                     |
| HW-21                           | 166'                         | 2005                   | -                  | 4                     |
| HW-28                           | 141'                         | 2005                   | -                  | 4                     |
| HW-30                           | 164'                         | 2005                   | -                  | 4                     |
| HW-31                           | 325'<br>> 318' OBSTRUCTION   | 2003<br>2005           | SKIM?<br>-         | 4                     |
| HW-33                           | 130'                         | 2003                   | -                  | 4                     |
| HW-35                           | 23'<br>>295' OBSTRUCTION     | 2003<br>2005           | -<br>-             | 4                     |
| HW-37                           | >320' OBSTRUCTION            | -                      | -                  | 4                     |
| HW-38                           | 269'                         | 2005                   | -                  | 4                     |
| HW-203                          | 1'<br>161'                   | 2003<br>2005           | -<br>-             | 4                     |
| HW-204                          | >245'-OBSTRUCTION            | 2003                   | -                  | 4                     |
| HW-206                          | 284'                         | 2003                   | -                  | 4                     |
| HW-207                          | 386'                         | 2003                   | -                  | 4                     |
| HW-211                          | 124'                         | 2005                   | -                  | 4                     |
| HW-212                          | 330'                         | 2005                   | -                  | 4                     |
| HW-221                          | 400'+                        | 2003                   | -                  | 4                     |
| HW-222                          | 400'+                        | 2005                   | -                  | 4                     |
| HW-223                          | 400'+                        | 2003                   | -                  | 4                     |
| HW-224                          | 330'                         | 2003                   | SKIM               | 4                     |
| HW-225                          | 400'+                        | 2005                   | -                  | 4                     |
| HW-226                          | 333'                         | 2005                   | -                  | 4                     |
| HW-229                          | 152'                         | 2005                   | -                  | 4                     |
| HW-230                          | >15' OBSTRUCTION             | 2005                   | -                  | 4                     |
| HW-232                          | 400'+                        | 2005                   | -                  | 4                     |

| WELL   | FLUID DEPTH       | YEAR FLUID MEASURED | TOP OF OIL IN WELL | PLUGGING PRIORITY* |
|--------|-------------------|---------------------|--------------------|--------------------|
| HW-301 | 180'              | 2005                | -                  | 4                  |
| HW-302 | 366'              | 2005                | -                  | 4                  |
| HW-305 | 400'+             | 2005                | -                  | 4                  |
| HW-306 | 303'              | 2005                | -                  | 4                  |
| HW-307 | 400'+             | 2005                | -                  | 4                  |
| HW-401 | 326'              | 2005                | -                  | 4                  |
| 32     | >240' OBSTRUCTION | 2005                | -                  | 4                  |
| AW-4   | P&A               |                     |                    | 5                  |
| AW-5   | P&A               |                     |                    | 5                  |
| AW-6   | P&A               |                     |                    | 5                  |
| AW-8   | P&A               |                     |                    | 5                  |
| AW-9   | P&A               |                     |                    | 5                  |
| BW-1   | P&A               |                     |                    | 5                  |
| BW-2   | P&A               |                     |                    | 5                  |
| BW-3   | P&A               |                     |                    | 5                  |
| CW-5   | P&A               |                     |                    | 5                  |
| CW-9   | P&A               |                     |                    | 5                  |
| DW-1   | P&A               |                     |                    | 5                  |
| DW-2   | P&A               |                     |                    | 5                  |
| DW-3   | P&A               |                     |                    | 5                  |
| DW-6   | P&A               |                     |                    | 5                  |
| DW-11  | P&A               |                     |                    | 5                  |
| DW-12  | P&A               |                     |                    | 5                  |
| DW-13  | P&A               |                     |                    | 5                  |
| DW-14  | P&A               |                     |                    | 5                  |
| DW-17  | P&A               |                     |                    | 5                  |
| DW-18  | P&A               |                     |                    | 5                  |
| FW-7   | P&A               |                     |                    | 5                  |
| HW-210 | P&A               |                     |                    | 5                  |
| HW-215 | P&A               |                     |                    | 5                  |
| HW-231 | P&A               |                     |                    | 5                  |

TOTAL WELLS 181

P&A 24

UNPLUGGED: 157

\*Plugging Priorities:

- 1) Well near residence/stream and/or oil at shallow depth (<100')
- 2) Well has shallow water in annulus (<100')
- 3) Well with deeper oil in annulus (>100')
- 4) Well with deeper water in annulus (>100')
- 5) Already Plugged